

TECHNICAL REVIEW DOCUMENT
For
RENEWAL OF OPERATING PERMIT 02OPAD250

W.J. Whatley, Inc.
Adams County
Source ID 0010531

Prepared by Blue Parish
December 2009, February & March 2010, & October 2011

I. Purpose

This document establishes the basis for decisions made regarding the applicable requirements, emission factors, monitoring plan and compliance status of emission units covered by the renewed Operating Permit for the W.J. Whatley, Inc. facility. The previous Operating Permit for this facility was issued on October 1, 2004, was last revised on April 25, 2007 and expired on October 1, 2009. However, since a timely and complete renewal application was submitted, under Colorado Regulation No. 3, Part C, Section IV.C all of the terms and conditions of the existing permit shall not expire until the renewal operating permit is issued and any previously extended permit shield continues in full force and operation.

This document is designed for reference during the review of the proposed permit by the EPA, the public, and other interested parties. The conclusions made in this report are based on information provided in the renewal application submitted on September 30, 2008, additional information submitted on December 2, 2009, comments on the draft permit submitted on [date], previous inspection reports and various email correspondence, as well as telephone conversations with the applicant. Please note that copies of the Technical Review Document for the original permit and any Technical Review Documents associated with subsequent modifications of the original Operating Permit may be found in the Division files as well as on the Division website at <http://www.cdphe.state.co.us/ap/Titlev.html>. This narrative is intended only as an adjunct for the reviewer and has no legal standing.

Any revisions made to the underlying construction permits associated with this facility made in conjunction with the processing of this operating permit application have been reviewed in accordance with the requirements of Regulation No. 3, Part B, Construction Permits, and have been found to meet all applicable substantive and procedural requirements. This operating permit incorporates and shall be considered to be a combined construction/operating permit for any such revision, and the permittee shall be allowed to operate under the revised conditions upon issuance of this operating permit without applying for a revision to this permit or for an additional or revised construction permit.

II. Description of Source

This facility is located at 3550 Odessa Way, Aurora, Adams County, Colorado. The plant produces fiberglass light poles. There is a process line for short poles and one for longer poles. The light poles are produced by passing fiberglass strands through a tray

of polyester resin and winding the strands around a steel mandrel (mold). Steam from the boiler is pumped into the mold to cure (harden) the resin and the pole is then removed from the mandrels and either dry sanded or placed into a mold where resin is added to create a decorative cover on the pole. The poles are then painted on an automated trolley system in the paint booth. Wax or cellophane is used as a mold release. Bases are created by either laying up resin-impregnated fiberglass inside external molds or casting polyurethane in closed molds. The bases are finished by spray application of paint.

This facility is located in the Denver Metro Area. The Denver Metro Area is classified as attainment/maintenance for particulate matter less than 10 microns in diameter (PM₁₀) and carbon monoxide (CO). Under that classification, all SIP-approved requirements for PM₁₀ and CO will continue to apply in order to prevent backsliding under the provisions of Section 110(l) of the Federal Clean Air Act. The Denver Metro Area is classified as non-attainment for ozone and is part of the 8-hr Ozone Control Area as defined in Regulation No. 7, Section II.A.1.

There are no affected states within 50 miles of the plant. Rocky Mountain National Park is a Federal Class I designated area within 100 kilometers of the plant.

Based on the information provided by the applicant, this source is categorized as a minor stationary source for both NANSR and PSD as of the issue date of this permit.

For NANSR, any future modification at this facility which is major by itself (i.e. a Potential to Emit of ≥ 100 TPY of either VOC or NO_x) may result in the application of the NANSR review requirements.

For PSD, any future modification at this facility which is major by itself (Potential to Emit of ≥ 250 TPY) for any pollutant listed in Regulation No. 3, Part D, Section II.A.42 for which the area is in attainment or attainment/maintenance may result in the application of the PSD review requirements

Emissions (in tons/yr) at the facility are as follows:

Pollutant	Potential to Emit (PTE) – tons per year	Actual Emissions – tons per year
Volatile Organic Compounds (VOC)	80.0	52.9
Total Hazardous Air Pollutants (HAP)	>25	26.5
Styrene (highest HAP)	>10	17.8
PM	0.04	0.004
PM ₁₀	0.04	0.004

PTE is based on Operating Permit limits. Actual emissions are based on the Division's Inventory system for year 2008. Note that the numbers shown above do not include Methyl Ethyl Ketone, which was removed from the list of Federal HAPs on December 19, 2005.

Applicable Requirements

Compliance Assurance Monitoring (CAM)

The facility does not use any control device to meet emission limits or standards for VOC or HAPs. Uncontrolled emissions from the dry sanding operation are less than the major source threshold of 100 tons per year (42.8 tons per year, uncontrolled). Dry filters are included on the paint booths for overspray, but the amount of particulate matter captured by the filters is expected to be significantly less than 100 tons per year. Therefore no controls at the facility are subject to CAM requirements.

Polyester Resin Styrene

The previously issued permit includes a limit on the styrene content of the polyester resin of 43% (Section II, Condition 1.3). Prior to the original operating permit, the facility-wide construction permit 91AD411 included a styrene limit of 37%, which was presumably related to the synthetic minor status (with respect to HAPs) of the facility at that time. During the drafting of the original operating permit, the facility requested an increase in styrene content to 43%, and this increased limit was incorporated directly into the operating permit under the combined construction/operating permit described in Section I, Condition 1.3 of the operating permit.

Prior to the public notice period for this Renewal 1, Whatley requested that this permit condition be removed. Since the facility no longer operates as a synthetic minor HAP facility, the Division agrees that there is no longer a basis for the polyester resin styrene limit.

Reinforced Plastics Composite Production MACT (40 CFR 63 Subpart WWWW)

According to the previously issued permit and technical review document and information submitted by the applicant, the facility is an existing source that includes the following operations that are subject to MACT WWWW as defined in 40 CFR 63.5790(b): open molding (mechanical winding resin-impregnated filament), mixing, cleaning of equipment used in reinforced plastics composite manufacture (RPCM) and HAP-containing materials storage. The facility also includes the following operations that are specifically excluded from requirements in MACT WWWW as defined in 40 CFR 63.5790(c): application of mold sealing and release agents and mold stripping and cleaning. This facility does not repair parts manufactured at the facility. The facility does not include centrifugal casting or continuous lamination/casting operations.

MACT WWWW was initially published in the federal register on April 21, 2003, but was subsequently amended on August 25, 2005 (70 FR 50124). The most recent issuance of the Operating Permit (October 1, 2004 and revised on April 25, 2007 to reflect a change in the address/location) does not include the amended rule. Changes to the rule that are relevant to operations at this facility include:

- Removal of the highest organic HAP content for compliant materials shown in Table 3 (included in the 10/1/2004 Operating Permit as condition 1.7.9). EPA notes in the preamble to the amendment that the purpose for including these values in the original rule was to provide examples of compliant materials and

that they were not to be construed as emission limits or HAP content limits. The amended rule removes the highest HAP content column from Table 3, and reorganized the discussion of compliance options in 63.5810 (included in the 10/1/2004 Operating Permit as Condition 1.7.11).

- Modification of 63.5810 to allow facilities to demonstrate compliance for some resins and gel coats using averaging, while demonstrating that other materials can comply individually, as applied. EPA notes in the preamble to the amendment that the wording of the previous rule would force all materials to be averaged together unless each and all of them met the emission limit individually, which was not the original intent.
- Addition of paragraph (i) to 63.5910 specifying how a source is to report changing compliance options.
- Correction of numerical errors in equation 1.f of Table 1 and rounding errors on emission limits for some of the processes in Table 3.
- Removal of the manual gel coat equation in Table 1, and revision of the footnote concerning manual gel coat application in Table 3 to make it clear that to demonstrate compliance for manually applied gel coat, it should be treated as if it were applied using spray equipment.

In addition to changes in the rule, the following issues were identified with the MACT WWW permit conditions in the 10/1/2004 Operating Permit:

- Condition 1.7.8 states that the compliance date for this facility was April 21, 2006. This is also the date that data collection commences for purposes of demonstrating compliance with the 12-month rolling average emission standard. The initial compliance demonstration was due 30 days after the end of April 2007. The source submitted a notification of compliance status on May 22, 2006. Therefore, this condition will be removed from the renewal permit.
- Condition 1.7.11.4 incorrectly states that 63.5810(d) requires compliance with the maximum organic HAP content. The rule requires compliance with HAP emission limits, not HAP content (see discussion of how EPA clarified the rule, above).
- Condition 1.7.13 includes work practice standards from 63.5835(c), which require the facility to submit certified statements in the Notice of Compliance Status regarding the work practice requirements for cleaning solvents, HAP-containing material storage operations and mixing operations. These statements were included in the Notice of Compliance Status Report that was received by the Division on May 22, 2006. This initial requirement is therefore satisfied and will not be included in the renewal permit.
- Condition 1.7.15 requires that an Applicability Notification required under 63.5905 be submitted by August 19, 2003. The applicability notification was submitted on May 1, 2003. This initial requirement is therefore satisfied and will not be included in the renewal permit.

- Condition 1.7.16 requires that the Notification of Compliance Status required under 63.5905 showing compliance with the HAP emission limit averaging provisions be submitted no later than 1 year plus 30 days after April 21, 2006. The Notification of Compliance Status Report was submitted on May 22, 2006. This initial requirement is therefore satisfied and will not be included in the renewal permit.
- Conditions 1.7.5 incorrectly states that the Material_i term to be used in the equation includes all HAP containing materials used; the rule notes that Material_i is actually only the neat resin plus or neat gel coat plus used. The renewal permit contains the language as it is stated in the MACT rule.
- Table 1 of MACT WWW shows calculations used for Organic HAP Emission Factors for both vapor-suppressed and nonvapor-suppressed resins. According to the technical review document for the original operating permit, the facility does not use vapor suppressants. It should be noted that if the facility uses vapor-suppressed resins in the future, the vapor suppressant effectiveness (VSE) must be determined through testing methods according to 63.5810(a) prior to using any of the equations for vapor-suppressed resins in Table 1.

Surface Coating of Plastic Parts and Products MACT (40 CFR 63 Subpart PPPP)

Subpart PPPP applies to the surface coating of plastic parts and products located at major sources of HAPs. The final rule was published in the federal register on April 19, 2004. Existing sources were required to submit an initial notification within one year after publication of the final rule. The original operating permit (issued October 1, 2004) and the most recent revision (April 25, 2007, reflecting a change in the address/location) did not include Subpart PPPP requirements. The applicant submitted the Initial Notification and Notification of Compliance Status for Subpart PPPP on September 15, 2008 (received by the Division on September 16, 2008).

Subpart PPPP addresses four different subcategories of coating operations related to the surface coating of plastic parts and products, and includes different standards for each subcategory: (1) general use coating, (2) automotive lamp coating, (3) thermoplastic olefin coating and (4) assembled on-road vehicle coating. Based on the information in the application, the facility intends to coat parts/objects that are subject to the general use requirements.

Subpart PPPP also includes several compliance options, including a compliant materials option, and options for meeting an emission rate standard with or without add-on controls. The application notes that compliance will be demonstrated with either the compliant materials option or the emission rate without add-on controls option.

The renewed Operating Permit will include Subpart PPPP requirements as new condition 2.7 in Section II, and in the compliance plan included as Appendix J. In addition to the issues related to facility operations and compliance options discussed above, the following information is relevant to the determination of Subpart PPPP requirements in Condition 2.7:

- 63.4510(b) requires the submittal of an initial notification. The source submitted this notification on September 16, 2008; therefore this requirement is not included in the permit.
- 63.4510(c) requires the submittal of the Notification of Compliance Status report. The source submitted this notification on September 16, 2008; therefore this requirement is not included in the permit.

Other MACT Requirements

Subpart HHHHH - National Emission Standards for Hazardous Air Pollutants: Miscellaneous Coating Manufacturing. The facility does not manufacture coatings, and is therefore not subject to these requirements.

Subpart HHHH – National Emission Standards for Hazardous Air Pollutants for Wet-Formed Fiberglass Mat Production. The facility does not produce fiberglass mat by bonding glass fibers to each other using a resin solution, and is therefore not subject to these requirements

Subpart HHHHHH - National Emission Standards for Hazardous Air Pollutants: Paint Stripping and Miscellaneous Surface Coating Operations at Area Sources. The facility is a major source of HAPs; therefore these requirements do not apply.

Subpart MMMM – National Emission Standards for Hazardous Air Pollutants: Surface Coating of Miscellaneous Metal Parts and Products. Subpart MMMM applies to sources using more than 250 gallons per year of HAP-containing coatings for the purpose of coating miscellaneous metal parts and products. This facility does not use more than 250 gallons per year of HAP-containing coatings on such activities; therefore Subpart MMMM does not apply.

New Source Performance Standards

Subpart FFF - Standards of Performance for Flexible Vinyl and Urethane Coating and Printing. This subpart applies to rotogravure printing lines used to print or coat flexible vinyl or urethane products. The facility does not conduct these activities; therefore these requirements do not apply.

Subpart TTT - Standards of Performance for Industrial Surface Coating: Surface Coating of Plastic Parts for Business Machines. The facility does not coat plastic parts that are used in the manufacture of business machines as defined under the subpart; therefore these requirements do not apply.

Subpart VVV - Standards of Performance for Polymeric Coating of Supporting Substrates Facilities. The facility does not use a web coating process that applies elastomers, polymers, or prepolymers to a supporting web other than paper, plastic film, metallic foil, or metal coil. Therefore these requirements do not apply.

Colorado Regulation No. 7

This source is subject to the state-wide requirements of Regulation No. 7 (Control of Ozone via Ozone Precursors). Reg 7 Section V prohibits the disposal of VOCs by

evaporation or spillage unless RACT is applied. This requirement is included in Condition 29 of the General Permit Conditions Section (Section IV). This source is also subject to the requirement to control fugitive emissions of VOC under Section IX.A.7.

National Emission Standards for Major Sources: Industrial/Commercial/Institutional Boilers and Process Heaters (Major Source Boiler MACT - 40 CFR Part 63 Subpart DDDDD)

On May 18, 2011, EPA delayed the effective dates for Subpart DDDDD “under the authority of the Administrative Procedure Act (APA) until the proceedings for judicial review of these rules are completed or the EPA completes its reconsideration of the rules, whichever is earlier.” (76 FR 28662). These provisions will be included in the permit when the rules are in effect.

Dry Sanding Operation (AIRS ID #005; Colorado Construction Permit No. 09AD0201)

On January 24, 2008, the source submitted an APEN to notify the Division that the wet sanding operation (which did not have any associated emissions) was being replaced with a dry sanding operation. The dry sanding operation uses belt sanders and a cut off saw to sand and trim the light poles; emissions are collected and controlled by baghouses. The Division issued Initial Approval Construction Permit 09AD0201 on May 20, 2009 for the dry sanding operation.

The source has demonstrated compliance under the Provisions of Regulation No. 3, Part B, Section III.G.2 for initial approval construction permit 09AD0201 but not yet received a final approval construction permit. Under the provisions of Regulation No. 3, Part C, Section V.A.3, the Division will not issue a final approval construction permit and is allowing the initial approval construction permit to continue in full force and effect. The appropriate provisions of the initial approval construction permit have been directly incorporated into this operating permit as follows:

- Visible emissions shall not exceed 20% during normal operation, or 30% during periods of startup, process modification, or adjustment of control equipment.

Note that Colorado Regulation No. 1 does not identify the 20% opacity requirement as a condition that only applies during normal operation and EPA has objected, in comments on another operating permit, to the term “normal operations” applied to the 20% opacity standard. The specific operational activities subject to the 30% opacity requirement are also conditions that can be considered “normal operation”. Therefore, the language in the permit will not specify “normal operation”. The 30% opacity requirement will be written to include all the specific operational activities identified in Reg 1 except for fire building, cleaning of fire boxes and soot blowing, which are not expected to apply to non-combustion sources.

This operation does not involve combustion emissions, and zero opacity is expected from the exhaust whenever the control equipment is operating properly. Therefore, the Division has determined the following monitoring requirements to be protective of the standard: daily visual opacity observations of the exhaust to the atmosphere are required. If any visible observations are noted, the

equipment is to be shut down and repairs or maintenance performed and documented. If visible emissions occur for two successive days, a Method 9 observation is required, and subsequent Method 9 observations are required daily when an exceedance of the standard is observed.

Compliance with the 30% opacity during periods of startup, process modification or adjustment of control equipment is presumed in absence of credible evidence to the contrary, provided that the Division-approved operation and maintenance plan is followed.

- The manufacturer, model number and serial number of the belt sanders and cutoff saw shall be provided to the Division prior to Final Approval

This information was provided by the source with the self certification for final approval received by the Division on June 22, 2009; this requirement will not be included in the operating permit.

- Emissions of air pollutants shall not exceed 0.04 tpy PM and 0.04 tpy PM₁₀, on a rolling 12 month total.

Since the permitted emission rate (controlled) of 0.04 tpy is based on a production of 70,080 poles per year, the Division is including a compliance emission factor in units of lb/pole produced (0.00122 lb/pole produced for each of PM and PM₁₀).

- The production rate shall be limited to 70,080 light poles per year on a rolling 12 month total.
- Prior to final approval, the applicant shall submit to the Division for approval an operating and maintenance plan for all control equipment and control practices, and a proposed recordkeeping format that will outline how the applicant will maintain compliance on an ongoing basis with the emission and production limitations.

The source submitted a final approval compliance demonstration, received by the Division on June 22, 2009. The demonstration included operations and maintenance inspection checklists that require daily pre-startup and daily startup requirements to examine the baghouse and associated components for damage, to ensure that the collection drum is emptied appropriately and to confirm that the unit is operating within a specified pressure differential and sequencer pulse frequency. Also required are monthly and quarterly inspection and maintenance requirements. The Division approves these checklists (included as Attachment 1 at the end of this document) and considers them to be the most recent Division-approved Operation and Maintenance Plan as of the issuance date of the renewal permit. A condition requiring compliance with the O&M plan requirements will be included in the permit in order to demonstrate compliance with opacity standards.

- Emissions shall be controlled by a baghouse capable of reducing uncontrolled emissions of particulate matter to the permitted limits. Operating parameters of

the control equipment shall be identified prior to final approval of this permit. The identified operating parameters will replace the control efficiency on the final permit.

Emissions from the dry sanding operation were estimated based on the amount of material collected during sanding operations, and assumed a baghouse control efficiency of 99.9% for PM and PM10. The inspection and maintenance checklists submitted with the final approval compliance demonstration are sufficient to ensure that the baghouse can sustain the expected control efficiency and permitted emission limits.

- During any consecutive 60 minute period, PM emissions from the dry sanding operation shall not exceed the following limitation: $E = 3.59 (P)^{0.62}$, where E is the allowable particulate emissions in lb/hr and P is the process weight rate in tons/hr. In absence of credible evidence to the contrary, compliance with the standard is presumed provided that the baghouse is operated in accordance with the operating and maintenance plan to be submitted prior to final approval.

The particulate standard requirement is included in both Colorado Regulations No. 1 (III.C.1.b) and No. 6 (Part B, II.C.2). Note that the requirements of Regulation 6 are state-only enforceable, and therefore may be streamlined out of the operating permit in favor of the Regulation No. requirement.

The numerical value for the PM standard is based on a maximum process weight rate of 8 poles sanded per hour. Each pole weighs 57.5 pounds, or $P = 0.23$ lb/hr. Therefore, the PM emission limit $= 3.59 * (0.23)^{0.62} = 1.44$ lb/hr. The maximum potential hourly emissions of PM from the process is 0.001 lb/hr controlled. Therefore, compliance with the PM standard may be presumed, in absence of credible evidence to the contrary, based on proper operation and maintenance of the baghouse.

- Requirements to file revised APENs in accordance with Regulation No. 3 Requirements.

The APEN reporting requirements will not be identified in the permit as a specific condition but are included in Section IV (General Conditions) of the permit, condition 22.e.

- This source is located in a PM10 nonattainment-maintenance area and is subject to the Reasonably Available Control Technology (RACT) requirements of Regulation No. 3, Part B, Section III.D.2.a. The requirement to operate and maintain a baghouse capable of achieving the permitted PM₁₀ emission limit was determined to be RACT for this source.
- Within 180 days, compliance with the conditions of 09AD0201 must be demonstrated (self certification).

Permit 09AD0201 was issued on May 20, 2009. The source sent the Final Approval Compliance Demonstration on June 22, 2009, which included a signed self certification statement, a proposed operating and maintenance plan and

recordkeeping format, and model/serial numbers for the subject equipment. The Division approves the O&M plan as submitted, and has included a requirement to follow the most recently Division-approved plan in the renewal permit.

The source also submitted the results of a Method 22 visible emissions observation on December 30, 2009. The Method 22 was conducted on December 29, 2009 and showed no visible emissions; the Division considers the results of these tests sufficient to demonstrate compliance with the 20% opacity standard in the initial approval construction permit.

Compliance has been demonstrated; this condition will not be included in the renewal permit.

- Permit 09AD0201 shall expire if construction/operation does not commence within 18 months after the date of issuance or the scheduled date to commence construction.

The source is in operation and compliance was demonstrated; this condition is no longer required.

- This source is subject to the Operating Permits provisions of Regulation No.3, Part C. An application for modification to the current operating permit to incorporate this source is due within one year of commencing operation.

The source included the sanding operation in the renewal application received September 30, 2008.

Request for Modification to Dry Sanding Operation – December, 2009

The Division received a request from the source on December 2, 2009 for a reconfiguration of the sanding and cutoff operation, and a change to the way that holes are cut in the light poles that are manufactured at the facility.

Sanding and Cutoff Operation: The sanding and cutoff operation uses belt sanders and cutoff saws. The proposed reconfiguration will use the same equipment in a different configuration, and emissions from the sander heads will be routed to a new Donaldson Torrit baghouse that travels along the length of the poles with the sanders and does not emit to the atmosphere (i.e., this is not an emission point). The existing baghouse will continue to control the remaining operations. Although emissions from the existing baghouse can be expected to be reduced due to the addition of the Donaldson Torrit baghouse, the facility did not request any changes to permitted emission limits or requirements.

The source submitted an APEN in the modification request that reflects the addition of the Donaldson Torrit baghouse in accordance with the requirements of Colorado Regulation No. 3, Part B, Section II.C.3.d. The requirements applicable to the existing AQC Maxiflo baghouse (which vents to the atmosphere) are not affected by the addition of the Donaldson Torrit baghouse which now controls sanding (and does not vent to the atmosphere). The Division therefore considers this change to be administrative in nature and will update the description of the source/baghouses directly in the renewed operating permit. Note that because the Donaldson Torrit baghouse does not vent to

the atmosphere, it is not subject to the requirements that apply to the AQC Maxiflo baghouse; and will not be specified in the permit as it is not an emission point.

Hole Cutting: The change to the way that holes are cut in the light poles involves the replacement of hand drilling and routing operations with a stand mounted plunge router and a mortise stand with pneumatic drills. Potential emissions from the hole cutoff operation were estimated in the modification request based on samples collected during the routing operation and the permitted maximum number of light poles produced per year. Potential emission are less than APEN reporting thresholds and therefore qualify as an insignificant activity under Colorado Regulation No. 3, Part C, Section II.E.3.a. This operation will be included in the insignificant activity list of the renewed operating permit.

III. Discussion of Modifications Made

Source Requested Modifications

The renewal application received on September 30, 2008 and subsequent submittals requested the following modifications:

- Addition of the dry sanding operation to the permit
- Update the responsible official and facility contact information
- Update the attainment status and citations in Section I, Condition 3.1
- Section II – Add requirements 40 CFR 63 Subpart PPPP, National Emission Standards for Hazardous Air Pollutants for Surface Coating of Plastic Parts and Products
- Update the insignificant activities list of Appendix A
- Minor changes to the facility and equipment description language to more accurately represent operations at the facility, and
- A change to the timeframe/due dates semiannual and annual reporting periods

The source's requested modifications were addressed as follows:

Page following cover page

- Revised the responsible official and permit contact information in accordance with information submitted in the renewal application
- Revised the reporting periods

Section I – General Activities and Summary

- Updated Conditions 1.1 and 3.1 (status of source with respect to PSD requirements and the attainment status of the area) to reflect Division's current standard language and current Regulation No. 3 citations.

- Revised the permitted activities description in Condition 1.1 to include a description of the dry sanding operation and to include other minor changes as requested in the renewal application.
- Added a reference to construction permit 09AD0201 (dry sanding operation) in Condition 1.3
- Added the dry sanding operation to the Summary of Emission units in Condition 6.1 (previously condition 5.1).

Section II – Specific Permit Terms

- Removed the Polyester Styrene Limit (previously condition 1.3). All subsequent conditions are now renumbered.
- Added the requirements of 40 CFR 63 Subpart PPPP, National Emission Standards for Hazardous Air Pollutants for Surface Coating of Plastic Parts and Products as new condition 2.7 and a compliance plan included as Appendix J (described in detail under the Applicable Requirements Section of this document)..
- Added the dry sanding operation as new Condition 3 (described in detail under the Applicable Requirements Section of this document).

Appendices

- Appendix A was updated to include the following activities that are specified as insignificant activities in Regulation No. 3, Part C, Section II.E.3:
 - Brazing, soldering and welding operations used for maintenance purposes,
 - Aerosol can usage,
 - Janitorial activities and products
 - Forklifts
 - Sandblast Equipment where the blast media is recycled and the blasted media is collected
- Appendix A was also revised to include the following specific equipment as listed in the renewal application: Parker Boiler, serial number 57957 and Four (4) Hand-Sanding Tables. Additionally, the stand-mounted plunge router and mortise stand with pneumatic drills was added as a specific insignificant activity as described in information submitted to the Division on December 2, 2009.

Other Modifications

In addition to the source requested modifications, the Division has included changes to make the permit more consistent with recently issued permits, include comments made by EPA on other Operating Permits, as well as correct errors or omissions identified during inspections and/or discrepancies identified during review of this renewal.

Page Following Cover Page

- The appropriate monitoring and compliance periods and report due dates covering the period between issuance of the permit and the new requested compliance time periods will be filled in after permit issuance and will be based on permit issuance date.

Section I – General Activities and Summary

- Updated and re-organized Section I include the Division's current standard language and conditions.
- Revised the language in Condition 1.4 to include current conditions that are state-only enforceable (previously Condition 1.5).
- Added a note to the end of Condition 1.5 to state that either electronic or hardcopy records are acceptable (previously Condition 1.6).
- Removed the emission unit number column from the summary of activities table as it is not used by the facility or the Division. Removed AIRS ID 999 from the summary of activities table as this is a virtual AIRS point that does not exist (facility-wide emission limits and requirements still apply and are still included in the permit).

Section II – Specific Permit Terms

- Removed language at the beginning of Section II related to APEN reporting, emission factors and emission calculations as these requirements are otherwise addressed in the general and specific conditions of the permit.
- The renewal permit will incorporate MACT Subpart PPPP requirements applicable to the paint booths, which are currently grouped with all other equipment/activities at the facility into a single set of permit conditions. For clarity, the paint booths will be broken out into a separate condition (Condition 2), and the facility-wide VOC emission limit (currently Condition 1.1) will be moved to a new separate condition (Condition 2). Requirements under Condition 1.1 are subsequently renumbered.
- Condition 1.1 (previously Condition 1.2, related to consumption limits) - Updated the Regulation No. 3 citation referencing the definition of significant modification to match the current version of the regulation. The consumption limits and language related to the paint booths have been removed from this condition and moved to new condition 2.2.
- Removed former Condition 1.3 related to polyester resin styrene limits (see discussion above).
- Former Condition 1.4 relates to paint spray gun requirements. The paint booths are now listed as a separate point from the fiberglass fabrication activities; this condition is therefore moved to Condition 2 and subsequent requirements under Condition 1 are now renumbered.

- Included a note for Condition 1.2 (previously Condition 1.5, related to the odor requirements of Colorado Regulation No. 2) to show that the requirement is state-only enforceable. This condition originally referenced permit 92AD1418, which applies to the Viking paint booth. Because this condition no longer applies to the paint booths (which are moved to condition 2), the citation has been removed and replaced with the construction permit numbers for filament winding and casting/laminating.
- Condition 1.4 (previously Condition 1.7, related to MACT WWWW requirements)
 - Based on the changes to the 40 CFR 63 Subpart WWWW and the issues described above, the entire Subpart WWWW condition will be rewritten to incorporate the appropriate changes. The applicable compliance options of Subpart WWWW are included as the compliance plan in Appendix I.
 - 63.5895(d) allows that resin and gel coat use records are not required to be maintained for individual resins and gel coats that are demonstrated, as applied, to meet their applicable emission limit as defined in 63.5810(a). However, consumption of materials is required to be tracked in order to comply with other conditions of the permit not related to MACT WWWW (material consumption limits and emission calculation requirements). Therefore, this portion of 63.5810(a) has been streamlined out.
 - 63.5810(d) allows that resin use records are not required to be maintained for individual resins where compliance is demonstrated by meeting the HAP emission limits in Table 7 of Subpart WWWW. However, consumption of materials is required to be tracked in order to comply with other conditions of the permit not related to MACT WWWW (material consumption limits and emission calculation requirements). Therefore, this portion of 63.5810(d) has been streamlined out.
- Included a requirement for control of fugitive emissions (Regulation No. 7) for the paint booths as condition 2.6.
- The paint booths have the potential to emit particulate emissions due to overspray, and they are equipped with a filter to minimize such emissions. Sources of particulate matter are subject to the opacity requirements of Colorado Regulation No. 1. These requirements were included as conditions in the underlying construction permits (11AD154 and 92AD1418), but were not included in the previously issued versions of the Operating Permit. The opacity limitation will be included in the renewal as new condition 2.4. Note that Colorado Regulation No. 1, Section II.A.4 includes a 30% opacity requirement during periods of the building of a new fire, cleaning of fire boxes, soot blowing, start-up, any process modification, or adjustment or occasional cleaning of control equipment. The Division determines that for a paint booth, startup, fire building, cleaning of fire boxes and soot blowing do not apply, and that process modifications and adjustment or cleaning of the control devices will not occur while the booth is in operation. Therefore, the 30% opacity requirement is not included. The Division is including a new condition (2.5) in order to establish

maintenance procedures for the paint booth filters. The facility is required to maintain the filters as per the manufacturer's recommendations, or to submit maintenance procedures to the Division for review if manufacturer's recommendations are not available. Due to the requirements to operate and maintain the filters (new condition 2.5), compliance with the opacity standards may be presumed in absence of any credible evidence to the contrary.

- New Condition 4.1 (previously condition 1.1, related to facility-wide VOC emission limits) - updated the Regulation No. 3 citation referencing the definition of significant modification to match the current version of the regulation. Revised the condition to clarify that emissions are calculated using the emission factors in Appendix G for fiberglass fabrication and using a mass balance for paint booths.

Section III – Permit Shield

- Updated the Reg 3 Citation for the permit shield
- Included the state-only Regulation No. 6, Part B, II.C.2 in the streamlined conditions table (the process weight rate particulate matter standard), which streamlined out due to the identical requirement of Regulation No. 1, II.C.1.b.
- Included certain Subpart WWWW allowances in the streamlined conditions table that allow that resin and gel coat use is not required to be tracked under certain conditions. Other requirements in the permit (resin gel coat use limits and emission limits) require that these parameters are tracked.

Section IV – General Permit Conditions

- Updated the general permit conditions to the current version (3/23/2010).

Appendices

- Updated Appendices B and C (Monitoring and Permit Deviation Reports and Compliance Certification Reports) to the newest versions (2/20/2007).
- EPA's mailing address was revised (Appendix D). Removed the Acid Rain addresses in Appendix D, since annual certification is no longer required and submittal of quarterly reports/certifications is done electronically.
- Cleared the list of modifications from Appendix F related to the previous issuance.

IV. Public Notice Period

The public notice period was from November 14, 2011 through December 14, 2011; no comments were received.

ATTACHMENT 1: Operations and Maintenance Plan for the AQC Maxiflo Baghouse



Table 1: Operators Inspection Checklist

Date: _____ Time: _____ Employee Signature: _____					
WARNING: Always Lock out machinery prior to changing collection drum or working on unit.					
Frequency of Inspections	Equipment	Procedure	Pass	Fail	Comments
Daily Pre-Start-up	Dust Collector	Any damage to unit from the environment, vandalism or other unforeseeable events			
	Magnehelic	Inspect the Magnehelic connections for any physical damage			
	Electrical	Visibly inspect Electrical components for any cracked or broken lines.			
	Influent	Check in influent, effluent stacks and connections for any damages (e.g. dents or cracks)			
	Collection drum	Capacity of collection drum _____ %	Yes	No	
Drum has been emptied?					
Drum closure mechanism secured properly					
Daily Start-up Inspection	Effluent Influent stacks	Start up unit and observe both Influent and effluent stack for any visible emissions (for 30 seconds). Note: If visible emissions are observed, shut down unit and contact the EH&S Manager immediately.			
	Supplied Air	Check for air leaks (i.e. traces of dust or high pitch whistling sounds). If an air leak occurs shut down unit and contact the Maintenance Lead or EH&S Manager immediately.			
	Diaphragm Valves	Check the diaphragm valves and ensure that they are in good condition. Note: If any air leaks or abnormal audible noise occurs shut down unit and contact the Maintenance Lead or the EH&S Manager immediately.			
	Magnehelic Gauge	When unit is in operation mode check magnehelic gauge to ensure that the unit is operating in normal ranges (between 1.0 and 3.5 inch WG). If the magnehelic exceeds 4.5 inch WG shut down unit and contact the Maintenance Lead or the EH&S Manager.			
	Sequencer Pulse Frequency	Check the sequencer pulse frequency for 30 second intervals. If sequencer pulse frequency is not within the 30 second range (+ or - 5 seconds) shut down unit and contact the Maintenance Lead or the EH&S Manager immediately.			



Table 2: Maintenance Inspection Checklist

EH&S Signature: _____			Date: _____		
<p>NOTE: Always refer to the manufacture's operation and maintenance instructions when performing any maintenance or repairs on the Maxiflo dust collection system.</p> <p>WARNING: Always Lock out machinery prior to changing collection drum or working on unit.</p>					
Frequency of Inspections	Equipment	Procedure	Inspection Completed by:	Date	Comments
Monthly Maintenance Inspection (first week of every month)	Cartridge Filter Elements	Dislodge agglomerations			
		Inspect for damage and or leaks, check gaskets, repair or replace if necessary,			
	Magnehelic	Inspect the Magnehelic to ensure it is functioning properly. Repair or replace if necessary			
	Influent Stack	Check in influent, effluent stacks and connections for obstructions or damages (e.g. dents or cracks)			
	Effluent Exhaust Fan	Inspect effluent exhaust fan for damages or leaks.			
	Solenoid Valves	Inspect Solenoid Valves and ensure properly. Repair or replace if necessary			
	Diaphragm Valves	Inspect Diaphragm Valves to ensure that they are operating properly. Repair or replace if necessary			
	Sequencer Pulse Frequency	Verify the sequencer pulse frequency for 30 second intervals. Repair or replace if sequencer pulse frequency is not within the 30 second range (+ or - 5 seconds).			
Quarterly Maintenance Inspection (first week of the Quarter)	Internal influent duct	Clean out internal influent duct leading to dust collector.			
	Dust Collector Unit	General inspection, repair or replace any worn or defective part.			
		Tighten all motor, fan and structure bolts.			
		Clean and paint where necessary.			

[illegible]